

**The Estate of Chemetco, Inc.**  
**Hartford, Illinois**

## **SECURITY PLAN**

**Dated: November 13, 2008**

**Prepared by: Gary J. Davis, CHMM**  
**EH&S Manager**

## **I. PURPOSE**

This Security Plan documents the security monitoring of the Chemetco, Inc. (Chemetco) Facility as required as required in paragraph 17 of the September 16, 2008 Interim Order in the Matter of the United States and the People of the State of Illinois v. Chemetco, Inc., Civil Case Nos. 00-670-DRH and 00-677-DRH (consolidated) and modified by Illinois Environmental Protection Agency in letter dated: October 3, 2008 as follows: “Security. The Estate [Bankruptcy Estate of Chemetco, Inc.] will provide security monitoring of the site utilizing Estate personnel during working hours, Monday through Friday. During non-working hours, security will be provided by the site’s security camera monitoring system.”

Additionally, the Facility currently operates under an Administrative Seal Order (Seal Order) issued on December 4, 2001 by the Director, Illinois Environmental Protection Agency (IEPA), presented as Attachment D1. The Seal Order restricts access and activity on the Facility due to the presence of “materials containing hazardous levels of lead and cadmium”. All personnel, other than Estate staff personnel, must be specifically authorized by IEPA (IEPA Collinsville Regional Office) before they can enter the smelter site and the adjacent properties, all of which are defined as the “Facility.”

Due to the anticipated future increase in activity on the Facility as follows, security of the Facility is of concern to protect personnel, property and prevent the release of materials of environmental concern to the environment:

1. Loading and shipments of sales materials (Cupro, Pot Slag, and Copper Furnace Cleanup Solids) from stockpiles in the Foundry Building are scheduled to begin in early December, 2008 under approved Work Plans under the Interim Order;
2. Upon approval of revised Work Plans for RCRA Closures of the AAF Decontamination Area and Sump and Brick Shop Container Storage Area, work is expected to commence in early December, 2008 and be completed and closed by December 31, 2008; and

3. By early December, 2008, the Estate expects to execute an agreement with Metallo Chimique NA to finance the removal and sale of the three furnaces in the Foundry Building. Work is not expected to start until late 1<sup>st</sup> Quarter 2009 after submission and approval of a Work Plan.

## **II. SECURITY MEASURES**

### **A. Security Cameras and Alarm Systems**

Security Cameras – The Estate contracts with Pass, a local security company, to provide a 24-hour web-based security camera system. Cameras are strategically located on the smelter site and along the perimeter along with lighting to record the presence of intruders on the site.

Alarm Systems – The Estate contracts with Pass to provide a 24-hour password entry/alarm system on the offices, Mobile Shop/Store Room, and Brick Shop. Passwords are only issued to Estate personnel. The last Estate person leaving for the day must activate the alarm system using their password. The first person arriving for the day must deactivate the alarm system to enter the alarmed buildings. The same is true when entering and exiting the Mobile Shop/Store Room and the Brick Shop.

Motion Detector – The west end of the Tank House is protected by a motion detector set to activate during dark hours.

### **B. Physical Barriers**

Fencing and Gates – The smelter site is surrounded with an eight-foot high wire mesh fence and gates, including a locked metal gate at the east entrance to the Facility property at Chemetco Lane and Old Alton Road. All gates are locked at all times and keys are securely maintained by the staff.

Barriers – Chemetco Lane is physically blocked with piles of stone and large concrete blocks to prevent access to the smelter site from this back entrance.

### **C. Authorized Entry**

Authorization - All personnel desiring to enter the smelter site, except Estate personnel, are required to have prior authorization by the IEPA Collinsville Regional Office. Personnel are required to sign in and out and must provide the Estate with a Xerox copy of their driving license or other photo identification. These personnel must also be accompanied by a member of the Estate staff at all times while on site. Estate personnel will request authorization from IEPA for personnel seeking to enter the site and will maintain authorization in a file on site for verification. The only exceptions are IEPA or other state personnel, police, fire, and ambulance service.

Access to Site – The only accesses to the site are through locked office doors and a locked gate from the main parking lot which have to be unlocked by Estate personnel. A buzzer is present on the Estate office building to signal Estate personnel of their presence.

### **D. Police Protection**

The Facility is in unincorporated Madison County and is served by the Madison County Sheriff's office. **DIAL 911 TO CALL FOR POLICE ASSISTANCE.**

The Hartford Police Department is also available for assistance.

#### **IV. RESPONSIBILITIES**

Management of Facility – Laura K. Grandy, Trustee

Security – Judy Gifford, Eric Watt, and George Boud

**ATTACHMENT D1**  
**IEPA SEAL ORDER**